



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Alan Kramer, Treasurer
Wisconsin Right to Life Political Action
Committee
10625 W. North Avenue
Milwaukee, WI 53226

NOV 10 1998

Identification Number: C00173278

Reference: 12 Day Pre-Primary Report (7/1/98-8/19/98)

Dear Mr. Kramer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The Summary Page discloses \$38,635.21 on Line 7, Column B, but the Detailed Summary Page shows the Line 30, Column B total to be \$47,456.21. These figures should be the same. Please amend your report accordingly.

-Your report discloses an outstanding balance(s) beginning this period for a debt(s) owed to Alan Neuwirth, A to Z Printing, T Q Mail, and First Breath Alliance. However, an outstanding balance(s) at the close of the period was not disclosed on your July Quarterly Report. Please amend your report(s) to clarify this discrepancy.

-Schedule D of the July Quarterly Report disclosed a debt to your connected organization for the rental of a mailing list. Schedules D and E of the 12 Day Pre-Primary Report indicates an increase of this debt and subsequent payments (pertinent portions attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election.

Please amend your report to clarify whether the payments to your connected organization was for expenditures which were intended to influence federal

elections and provide the dates of the independent expenditures, the dates the mailing list was used to facilitate the independent expenditures, and the dates the connected organization was reimbursed. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

-Schedule E of your report discloses \$2,827.15 in payments to your connected organization for independent expenditures on behalf of federal candidates (pertinent portions attached). An independent expenditure is an expenditure for a communication which expressly advocates the election or defeat of a clearly identified candidate and which is not made with the cooperation or prior consent of, or in consultation with or at the request or suggestion of, any candidate or authorized committee or agent of a candidate. 11 CFR §109.1(a) Please clarify whether these disbursements meet the definition of an independent expenditure. In addition, please amend your report to clarify whether the payments to your connected organization were made in advance of services rendered.

-The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, purpose of the expenditure, date of payment, amount of payment, the name and office sought of the federal candidate supported or opposed, signature of the treasurer, and notarized certification of the information provided. Please amend Schedule E by providing the communication used (e.g. radio, television, newspaper). 11 CFR §104.3(b)(3)(vii)

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the aggregate year-to-date totals. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Richard Ng
Reports Analyst
Reports Analysis Division

Name of Committee (In Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close at This Period
Wisconsin Right to Life PAC A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Wisconsin Right to Life, Inc. 10625 W. North Ave. Milwaukee, Wisc 53226	\$5325	\$8675	\$14,000	0
Nature of Debt (Purpose): Rental of mailing list *				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor * On our last report, we indicated the first installment due for rental of the WRL, Inc list. However, in this period, the PAC was able to pay the entire amount due of \$14,000.				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor A to Z Printing 6535 River Pkwy. Wauwatosa, WI 53213	\$3442.56	0	3442.56	0
Nature of Debt (Purpose): Printing of brochure				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Alan Newirth (address not available - will put in next report)	\$ (estimate) 412.00	0	0	\$ (estimate) 412.00
Nature of Debt (Purpose): Type setting				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor A to Z Printing 6535 River Pkwy. Wauwatosa, WI 53213	estimate \$2300	0	0	estimate \$2300
Nature of Debt (Purpose): Printing of Newsletter				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor T & mail 2738 S. 163rd St. New Berlin, Wisc. 53151	\$ estimate 1150	0	0	\$ 1150 estimate
Nature of Debt (Purpose): mailing service chgs				
1) SUBTOTALS This Period This Page (optional)				3862
2) TOTALS This Period (last page in this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule D (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 4 Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)		I.D. No.		
Wisconsin Right to Life Fed PAC		C0017328		
Full Name, Mailing Address & ZIP Code of Each Entry	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
A to Z Printing 6535 River Pkwy Wauwatosa, Wisc. 53213	printing of brochure	7/2/98	\$3442.56	U.S. Senate Mark Neumann - support Russ Feingold - oppose <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Wisconsin Right to Life 10625 W. North Ave. Milwaukee, Wisc. 53226	The wages for time spent on direct election activities	7/7/98	\$225.11	U.S. Senate Mark Neumann - support Russ Feingold - oppose 8th Cong. Dist Mark Green - support Jay Johnson - oppose
The Right Stuff 4102 Miami St Omaha, Neb. 68111-3433	Down payment for bumper stickers.	7/9/98	\$500.00	U.S. Senate Mark Neumann, support Russ Feingold, oppose
Wisconsin Right to Life 10625 W. North Ave. Milwaukee, Wisc. 53226	The WRH/PAC rents the WRH/INC list for use to support & oppose various federal candidates. This expenditure is the first installment toward full payment	7/17/98	\$5000.00	U.S. Senate Mark Neumann - support Russ Feingold - oppose 8th CD Mark Green - support Jay Johnson - oppose 7th CD Scott West - support David Obey - oppose 1 CD Paul Ryan - support Lydia Spottswood - oppose
SUBTOTAL of Itemized Independent Expenditures			\$9167.67	
SUBTOTAL of Unitemized Independent Expenditures			\$	
TOTAL Independent Expenditures			\$	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing, dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 25th day of

August, 1998

My Commission expires in perpetuity

[Signature]
NOTARY PUBLIC

Susan M. Amundson, 8/25/98
Signature Date

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full)			I.D. No.	
Wisconsin Right to Life Federal PAC			C 0017328	
Full Name, Mailing Address & ZIP Code of Each Payer	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Wisconsin Right to Life, Inc. 10625 W. North Ave. Milwaukee, Wisc 53226	wages for time spent on direct election activities.	7/22/98	\$977.80	U.S. Senate Mark Neumann - sup. Russ Feingold - opp. Mark Green sup. Jay Johnson - opp ICD Paul Ryan - sup Lydia Spottswood - opp.
Wisconsin Right to Life, Inc. 10625 W. North Ave. Milwaukee, Wisc 53226	and payment for rental of WRL/Inc. list	8/3/98	\$2000.00	U.S. Senate Mark Neumann - sup. Russ Feingold - opp. ICD Mark Green, sup. Jay Johnson, opp ICD Scott West, sup. David Obay, opp ICD Paul Ryan - sup. Lydia Spottswood - opp.
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$2977.80	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$	
(c) TOTAL Independent Expenditures			\$	

Under penalty of perjury I certify that the independent expenditures reported herein were not made in collaboration, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or reproduction in whole or in part of any campaign materials prepared by the candidate, the campaign committee, or their agent.

Susan M. Dunscomb 8/25/98
Signature Date

Subscribed and sworn to before me this 25th day of August 1998

My Commission expires: permanant
[Signature]
NOTARY PUBLIC

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

Page 4 of 4 Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)		I.O. No.		
Wisconsin Right to Life Political Action Committee		C0017328		
Full Name, Mailing Address & ZIP Code of Each Payor	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & other sought
Wisconsin Right to Life Inc. 10625 W. North Ave Milwaukee, WI 53226	3rd payment for rental of WRL Inc. list	8/15/98	\$7000.00	U.S. Senate Mark Neumann - supp Russ Feingold - opp 8th CD Mark Green - supp Jay Johnson - opp 9th CD
Wisconsin Right to Life Inc. 10625 W. North Ave Milwaukee, WI 53226	wages for time spent on direct election activities	8/19/98	\$665.00	Scott West - supp David Obey - opp 1st CD Paul Ryan - supp Byron Spontano - opp
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of itemized independent expenditures			\$ 7665.00	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$	23089.08
(c) TOTAL Independent Expenditures			\$	



Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Michael M. Amundson 8/25/98
Signature Date

Subscribed and sworn to before me this 25th day of August 1998
My Commission expires is permanent
Michael A. Klavey
NOTARY PUBLIC

